

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

ROBERT F. KENNEDY, JR. ET AL.,

**CASE NO. 23-cv-0381 (CONSOLIDATED)
CIVIL ACTION NO. 22-cv-01213 (LEAD)**

v.

JOSEPH R. BIDEN, ET AL.,

Declaration of G. Shelly Maturin, II

I, G. Shelly Maturin, II, declare as follows:

1. I am an adult of sound mind and make this statement voluntarily, based upon my knowledge, education, and experience.
2. I am a member of the Louisiana bar (#26994) and of the Welborn & Hargett law firm, 1540 West Pinhook Road, Lafayette, Louisiana, 70503. I am local counsel for the *Kennedy* Plaintiffs in this action. This declaration is made in support of the *Kennedy* Plaintiffs' Motion for Third-Party Platform Discovery. If called as a witness, I could and would testify competently to the facts herein, except as to those matters stated on information and belief.
3. Attached hereto as Exhibit A is a true and correct copy of the attachment to the *Kennedy* Plaintiffs' proposed subpoena which seeks the Platforms' internal emails, texts, and meeting notes, as well as their external emails, texts, and meeting notes with the Defendants related to content moderation – tracking the terms of the already-complied-with congressional subpoenas. On information and belief, the Federal Defendants did not memorialize what was said, or by whom, at their meetings with the Platforms, only the dates on which they occurred, and at times the agenda or presentations made.

4. On information and belief, no formal litigation hold or retention policy requires the Platforms to preserve the records sought in our proposed subpoena attachment. Rep. Jordan's Dec. 14, 2022 letter-subpoena to Alphabet and YouTube does request that the company "preserve all existing and future records and materials relating to the topics addressed in this letter" including "records created using text messages, phone-based message applications, or encryption software." Nonetheless, this may not require preservation of records dating back to January 1, 2019, nor create any right or entitlement applicable to this civil litigation.

5. On information and belief, sometime after their July 19, 2022 service of third-party subpoenas on Alphabet, Inc., and Meta Platforms, Inc., the *Missouri* Plaintiffs reached an agreement with those Platforms in which little or no document production, and no depositions would occur, but instead the Platforms would provide the *Missouri* Plaintiffs with the names of federal officials with whom they had communicated.

6. On October 4, 2023, the *Kennedy* Plaintiffs made a written request to the *Missouri* Plaintiffs for a copy of all third-party platform discovery which they had obtained pursuant to the Court's July 12, 2022 order. All parties agree that requiring the *Kennedy* Plaintiffs to duplicate previously-completed discovery would be wasteful, delay-producing, and inconsistent with the Court's July 23, 2023 consolidation order. On October 24, 2023, the Missouri Attorney General's Office ("Missouri AG") provided the *Kennedy* Plaintiffs with a very limited set of documents, nearly entirely from LinkedIn. On November 3, 2023, the Missouri AG represented that those were all "the documents [they] received from social-media platforms pursuant to third-party subpoenas in the *Missouri* case," and that Facebook's disclosure of the identity of federal officials was not made in the form of a document but "through multiple emails between counsel embedded in extensive attorney discussions."

7. In November 2023, following the *Kennedy* Plaintiffs' agreement to be bound by the existing protective orders in Missouri (Doc Nos. 117, 143), the U.S. Department of Justice ("DOJ") produced to the *Kennedy* Plaintiffs what is purported to be the same document discovery DOJ had previously produced in Missouri.

8. On or about December 14, 2022, the U.S. House of Representatives Committee on the Judiciary subpoenaed internal documents from Alphabet, the parent entity of Google and YouTube, and on or about February 15, 2023 from Meta Platforms, the parent entity of Facebook and Instagram. On information and belief, according to Chairman Jim Jordan, these records were obtained only under threat of holding Meta's CEO Mark Zuckerberg in contempt of Congress. In late July and August, 2023, shortly after this Court's preliminary injunction issued in *Missouri*, Representative Jim Jordan published some of the records obtained thereby on Twitter, and additional records were included as an appendix to the amicus brief which the House Judiciary Committee's majority members filed in the *Missouri* appeal. Representative Jordan also made public on Twitter excerpts of other records obtained by congressional subpoena of Alphabet, Inc. On information and belief, neither production of third-party platform records in response to congressional subpoena is part of this Court's record in the *Missouri* or *Kennedy* cases, and most of the documents produced have not been made public.

9. On or about August 7, 2023, the House Judiciary Committee Majority filed an amicus brief in the *Missouri v. Biden*, Case No. 23-30445, Fifth Circuit appeal, Doc. No. 161, and an Appendix thereto which contains selected internal and external Facebook emails, meeting notes, and transcribed interviews. *See also id.* at 15 n.2 (citing Rep. Jim Jordan (@Jim_Jordan), TWITTER (July 27, 2023, 12:03 PM), <https://tinyurl.com/5nz8sn3b> ("THE FACEBOOK FILES PART 1"); Rep. Jim Jordan (@Jim_Jordan), TWITTER (July 28, 2023, 12:03 PM),

<https://tinyurl.com/3z5npf92> (“THE FACEBOOK FILES PART 2”); Rep. Jim Jordan (@Jim_Jordan), TWITTER (Aug. 3, 2023, 11:00 AM), <https://tinyurl.com/4kjvehbb> (“THE FACEBOOK FILES PART 3”); Rep. Jim Jordan (@Jim_Jordan), TWITTER (Aug. 7, 2023, 10:11 AM), <https://tinyurl.com/yebawzjr> (“THE FACEBOOK FILES PART 4”).) On information and belief, these documents were released in redacted form such that most of the Meta participants in the meetings and email-threads are not identifiable.

10. On information and belief, in the Spring of 2021 when he wrote the “bigger fish to fry” and related emails cited in and appended to this motion, Nick Clegg, a former deputy Prime Minister of the U.K., was then employed as President of Global Affairs at Meta; and he is still so employed. *See e.g.*, <https://about.meta.com/media-gallery/executives/nick-clegg/>.

11. The Federal Defendants, through DOJ counsel, have confirmed by email that they will shortly move to hold their appeal in abeyance pending the Supreme Court’s disposition of *Murthy*, and that their abeyance motion is limited to the appeal, not to further proceedings in this Court in *Kennedy v. Biden*.

12. Attached hereto as Exhibit A is a true and correct copy of the Kennedy Plaintiffs’ proposed subpoena attachment directed to Alphabet, Inc., and Meta Platforms, Inc.

13. Attached hereto as Exhibit B is, on information and belief, a true and correct copy of the U.S. House of Representatives Committee on the Judiciary subpoena for records from Alphabet, Inc., the parent entity of Google and YouTube, dated December 14, 2022.

14. Attached as Exhibit C is, on information and belief, a true and correct copy of Nick Clegg’s July 22, 2021 internal email at Meta Platforms, which includes these comments: “our current course [] is a recipe for protracted and increasing acrimony.... Given the bigger fish we have to fry with the Administration — data flows etc — that doesn’t seem a great place for us.”

And, “Sheryl [Sandburg, Facebook COO] is keen that we continue to explore some moves that we can make to show that we are trying to be responsive to the WH.”

15. Attached as Exhibit D is, on information and belief, a true and correct copy of Nick Clegg’s July 14, 2021 internal email at Meta Platforms, Inc., which includes these comments: “Can someone quickly remind me why we were removing not demoting/labeling – claims that COVID is man-made before May?”, and the following response: “Because we were under pressure from the administration and others to do more and it was part of the ‘more’ package ... We shouldn’t have done it.”

16. Attached as Exhibit E is, on information and belief, a true and correct copy of Bryan Rice’s (Facebook’s product design head) April 17, 2021 internal email to Nick Clegg at Meta Platforms, Inc., which includes this comment: “We aren’t responding to Rob’s [Flaherty] questions over email.”

17. Attached as Exhibit F is, on information and belief, a true and correct copy of a July 21, 2021 internal email at Meta Platforms, Inc., which contains this comment: “What the WH appears to want us to remove ranges from humor to totally non-violating chatter about vaccines.”

18. Attached as Exhibit G are, on information and belief, true and correct copies of two July 16, 2021 internal emails at Meta Platforms, Inc., which contain these comments: “This seems like a political battle that’s not fully grounded in facts, and it’s frustrating[.]”; and “...There are so many untested assumptions in what the administration is saying recently...not to mention how their definition of ‘misinfo’ is completely unclear... it also just seems like when the vaccination campaign isn’t going as hoped, it’s convenient for them to blame us.”

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in Lafayette, Louisiana, on April 24, 2024.



G. SHELLY MATURIN, II

EXHIBIT A

1. All documents and communications from January 1, 2019, to the present between or among any employee or contractor of your companies and any individual affiliated with the Executive Branch of the United States Government referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.

2. All documents and communications from January 1, 2019, to the present referring or relating to any public or private communications or statements from the Executive Branch of the United States Government concerning the moderation, deletion, suppression, restricting, or reduced circulation of content.

3. A list of the individuals, along with their current and prior titles, who are or have been responsible in any way for developing your companies' policies referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.

4. A list of the individuals, along with their current and prior titles, who are or have been responsible in any way for applying or executing your companies' policies referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.

5. A list of the individuals, along with their current and prior titles, who may have communicated with the Executive Branch of the United States Government regarding your companies' decisions or policies referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.

6. A list of any third-party groups, companies, or individuals that your companies have cooperated with, consulted with, or relied on, formally or informally, in making decisions or policies referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content. This list should include but is not limited to any fact-checking entities; other technology firms or social media platforms; advertisers or potential advertisers; financial services firms or payment

processors; proxy advisory firms; and investors or investment firms.

7. All documents and communications referring or relating to any third-party groups, companies, or individuals that your companies have cooperated with, consulted with, or relied on, formally or informally, in making decisions or policies relating to the moderation, deletion, suppression, restricting, or reduced circulation of content. This request includes but is not limited to:

a. All documents and communications referring or relating to the terms of any agreement between your companies and any third-party groups, companies, or individuals that your companies have cooperated with, consulted with, or relied on, formally or informally, in making decisions or policies relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.

b. All documents and communications referring or relating to any compensation — monetary or otherwise—that your companies provided to or received from any third-party groups, companies, or individuals that your companies have cooperated with, consulted with, or relied on, formally or informally, in making decisions or policies relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.

EXHIBIT B

ONE HUNDRED SEVENTEENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON THE JUDICIARY

2138 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6216

(202) 225-3951
judiciary.house.gov

December 14, 2022

Mr. Sundar Pichai
Chief Executive Officer
Alphabet
1600 Amphitheatre Parkway
Mountain View, California 94043

Ms. Susan Wojcicki
Chief Executive Officer
YouTube
901 Cherry Ave.
San Bruno, CA 94066

Dear Mr. Pichai and Ms. Wojcicki:

Big Tech is out to get conservatives, and is increasingly willing to undermine First Amendment values by complying with the Biden Administration's directives that suppress freedom of speech online. This approach undermines fundamental American principles and allows powerful government actors to silence political opponents and stifle opposing viewpoints. Publicly available information suggests that your companies' treatment of certain speakers and content may stem from government directives or guidance designed to suppress dissenting views.¹ Therefore, we write to request more information about the nature and extent of your companies' collusion with the Biden Administration.

Big Tech's role in shaping national and international public discourse today is well-known. In some cases, Big Tech's "heavy-handed censorship" has been "use[d] to silence prominent voices" and to "stifle views that disagree with the prevailing progressive consensus."²

¹ See, e.g., News Release, *Shareholder Activist Demands Google, YouTube Reveal Biden Admin's 'Take Down' Requests*, NEWS DIRECT (June 1, 2022); Peter Flaherty, *BlackRock Invests in Censorship*, NEWSWEEK (Oct. 7, 2022); Ben Geman, *Top Biden aide prods big tech to crack down on climate change misinformation*, AXIOS (June 9, 2022); *Federal government using social-media giants to censor Americans*, N.Y. POST (Sept. 6, 2021); Brad Dress, *Surgeon general demands data on COVID-19 misinformation from major tech firms*, THE HILL (Mar. 3, 2022); WAFB Staff, *La., Mo. Request depositions and add 47 defendants to lawsuit against federal government for alleged collusion with social media companies*, WAFB (Oct. 10, 2022); Ken Klippenstein & Lee Fang, *Truth Cops*, THE INTERCEPT (Oct. 31, 2022); cf. Alex Berenson, *My Lawsuit Will Shine a Light on Twitter Censorship*, WALL ST. J. (May 15, 2022); Vivek Ramaswamy & Jed Rubenfeld, *Twitter Becomes a Tool of Government Censorship*, WALL ST. J. (Aug. 17, 2022); *The White House and Twitter Censorship*, WALL ST. J. (Aug. 12, 2022).

² See, e.g., *Elon Musk's Hopeful Twitter Feed*, WALL ST. J. (Apr. 5, 2022).

Mr. Sundar Pichai
Ms. Susan Wojcicki
December 14, 2022
Page 2

Because of Big Tech's wide reach, it can serve as a powerful and effective partisan arm of the "woke speech police."³ Although the full extent of Big Tech's collusion with the Biden Administration is unknown, there are prominent examples and strong indications of Big Tech censorship following directives or pressure from executive branch entities.⁴ These examples raise serious concerns about how and why tech companies suppress, silence, or reduce the reach of certain political speech and speakers.⁵ The collusion of Big Tech and Big Government to advance censorship undeniably undermines liberty and jeopardizes our country's First Amendment values and protections.⁶

Republicans on the House Judiciary Committee are investigating Big Tech's commitment to freedom of speech online and the Biden Administration's collusion with Big Tech to censor, silence, or reduce the reach of certain information and viewpoints. Congress has an important interest in protecting and advancing fundamental free speech principles, including by examining how private actors coordinate with the government to suppress First Amendment-protected speech. As Congress continues to examine how to best protect Americans' fundamental freedoms, please provide the following information:

1. All documents and communications from January 1, 2020, to the present between or among any employee or contractor of your companies and any individual affiliated with the Executive Branch of the United States Government referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.
2. All documents and communications from January 1, 2020, to the present referring or relating to any public or private communications or statements from the Executive Branch of the United States Government concerning the moderation, deletion, suppression, restricting, or reduced circulation of content.

³ See *id.*

⁴ See, e.g., note 1, *supra*.

⁵ See, e.g., *Press Briefing by Press Secretary Jen Psaki*, THE WHITE HOUSE (Apr. 25, 2022); Ian Hanchett, *Mayorkas: We're Working with Platforms on 'How They Can Better Use' Their Terms to 'Prevent Harm' from Misinformation*, BREITBART (Aug. 2, 2021); Maggie Miller, *Cyber agency beefing up disinformation, misinformation team*, THE HILL (Nov. 10, 2021); Alexander Hall, *Biden climate advisor demands tech companies censor 'disinformation' to promote 'benefits of clean energy'*, FOX NEWS (June 14, 2022); Press Release, *NCLA Takes on U.S. Surgeon General's Censoring of Alleged Covid-19 "Misinformation" on Twitter*, NEW CIVIL LIBERTIES ALLIANCE (Mar. 25, 2022); Greg Piper, *CDC told Big Tech to censor COVID claims now debated by mainstream scientists, documents show*, JUST THE NEWS (July 28, 2022); *The White House and Twitter Censorship*, WALL ST. J. (Aug. 12, 2022); Press Release, *Missouri, Louisiana AGs File Suit Against President Biden, Top Admin Officials for Allegedly Colluding with Social Media Giants to Censor and Suppress Free Speech* (May 5, 2022); Joseph A. Wulfsohn, *White House asked Twitter why Alex Berenson wasn't banned from the platform, lawsuit reveals*, FOX NEWS (Aug. 12, 2022); Letter from Rep. Jim Jordan, Ranking Member, H. Comm. on the Judiciary, et al., to Mark Zuckerberg, CEO, Meta Platforms Inc. (Sept. 1, 2022); Letter from Ranking Member Jim Jordan, et al., to Mr. Parag Agrawal, CEO of Twitter (Mar. 31, 2022).

⁶ See, e.g., Vivek Ramaswamy & Jed Rubenfeld, *Twitter Becomes a Tool of Government Censorship*, WALL ST. J. (Aug. 17, 2022); cf. *Biden v. Knight First Amend. Inst. At Columbia Univ.*, 141 S. Ct. 1220, 1226 (2021).

Mr. Sundar Pichai
Ms. Susan Wojcicki
December 14, 2022
Page 3

3. A list of the individuals, along with their current and prior titles, who are or have been responsible in any way for developing your companies' policies referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.
4. A list of the individuals, along with their current and prior titles, who are or have been responsible in any way for applying or executing your companies' policies referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.
5. A list of the individuals, along with their current and prior titles, who may have communicated with the Executive Branch of the United States Government regarding your companies' decisions or policies referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.
6. A list of any third-party groups, companies, or individuals that your companies have cooperated with, consulted with, or relied on, formally or informally, in making decisions or policies referring or relating to the moderation, deletion, suppression, restricting, or reduced circulation of content. This list should include but is not limited to any fact-checking entities; other technology firms or social media platforms; advertisers or potential advertisers; financial services firms or payment processors; proxy advisory firms; and investors or investment firms.
7. All documents and communications referring or relating to any third-party groups, companies, or individuals that your companies have cooperated with, consulted with, or relied on, formally or informally, in making decisions or policies relating to the moderation, deletion, suppression, restricting, or reduced circulation of content. This request includes but is not limited to:
 - a. All documents and communications referring or relating to the terms of any agreement between your companies and any third-party groups, companies, or individuals that your companies have cooperated with, consulted with, or relied on, formally or informally, in making decisions or policies relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.
 - b. All documents and communications referring or relating to any compensation—monetary or otherwise—that your companies provided to or received from any third-party groups, companies, or individuals that your companies have cooperated with, consulted with, or relied on, formally or informally, in making decisions or policies relating to the moderation, deletion, suppression, restricting, or reduced circulation of content.

Mr. Sundar Pichai
Ms. Susan Wojcicki
December 14, 2022
Page 4

Please produce all documents and information as soon as possible but no later than 5:00 p.m. on December 29, 2022. In addition, please treat these discovery obligations as ongoing and applicable to any information generated after receipt of this letter.

Furthermore, this letter serves as a formal request to preserve all existing and future records and materials relating to the topics addressed in this letter. You should construe this preservation notice as an instruction to take all reasonable steps to prevent the destruction or alteration, whether intentionally or negligently, of all documents, communications, and other information, including electronic information and metadata, that are or may be responsive to this congressional inquiry. This instruction includes all electronic messages sent using your official and personal accounts or devices, including records created using text messages, phone-based message applications, or encryption software.

Thank you for your prompt attention to this matter.

Sincerely,



Jim Jordan
Ranking Member

cc: The Honorable Jerrold L. Nadler, Chairman

EXHIBIT C

Whether you think this is the right approach or no, this is a reasonable way to look at things”

2. Andy S has also provided this as an eg of unlabeled content which he says is doing the rounds and is being cited by a clinic in LA as one of the reasons why many people are not getting their second jab:

https://www.instagram.com/p/CRbw8NEsOc6/?utm_medium=share_sheet

Grateful if someone could explain why this wasn't labeled?

He also shared this which I think rather proves our point – are we supposed to remove “gibberish”? - but grateful for views since I'd like to get back to Andy on it (he claims he is trying to be helpful by passing on our POV to the Surgeon General before the Fri meeting):

<https://twitter.com/oneunderscore/status/1418016654580199427?s=10>

3. Sheryl is keen that we continue to explore some moves that we can make to show that we are trying to be responsive to the WH. [REDACTED] – I have explained to her that you think the blackholing idea doesn't work after all.

We should take stock after the Fri meeting, but my sense is that our current course – in effect explaining ourselves more fully, but not shifting on where we draw the lines or on the data we provide (subject to the agreement last night that we'd offer up VPVs of content we've removed but only if demanded from other platforms on the same basis) is a recipe for protracted and increasing acrimony with the WH as the vaccine roll out continues to stutter through the Fall and the Winter. Given the bigger fish we have to fry with the Administration – data flows etc – that doesn't seem a great place for us to be, so grateful for any further creative thinking on how we can be responsive to their concerns.

THx

N

EXHIBIT D

Case: 23-30445 Document: 161 Page: 46 Date Filed: 08/07/2023

From: Nick Clegg [REDACTED]
To: [REDACTED]
CC: Brian Rice; [REDACTED]
Sent: 7/14/2021 11:46:33 AM
Subject: Re: Brief: 07.14.21 - Andy Slavitt Podcast

thx

From: [REDACTED] <[REDACTED]@fb.com>
Date: Wednesday, July 14, 2021 at 7:44 PM
To: Nick Clegg <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Cc: Brian Rice <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Brief: 07.14.21 - Andy Slavitt Podcast

Because we were under pressure from the administration and others to do more and it was part of the "more" package. We removed four claims that multiple fact checkers had labeled false even though we didn't have a harm assessment. We shouldn't have done it. We stopped removing the man made claim in May and now we're moving the other three claims (covid is new/patented) from remove to reduce and inform.

From: Nick Clegg <[REDACTED]@fb.com>
Sent: Wednesday, July 14, 2021 11:41:56 AM
To: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>, Brian Rice <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Brief: 07.14.21 - Andy Slavitt Podcast

Can someone quickly remind me why we were removing – rather than demoting/labeling – claims that Covid is man made before May?

From: [REDACTED] <[REDACTED]@fb.com>
Date: Wednesday, July 14, 2021 at 5:32 PM
To: [REDACTED] <[REDACTED]@fb.com>, Nick Clegg <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Cc: [REDACTED] <[REDACTED]@fb.com>, Brian Rice <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>
Subject: Re: Brief: 07.14.21 - Andy Slavitt Podcast

Following up here (and replying on behalf of [REDACTED] as well who is presenting in another meeting): We worked to further streamline and simplify the talking point around the 12 people identified by the CCDH ('disinfo dozen'). We'd recommend using the following:

"People on the Center for Countering Digital Hate's list show up in multiple places across Facebook products: Facebook pages, Facebook groups, and IG accounts for example. If they repeatedly break our rules, we permanently remove that page, group, or account from our services, and we've done that in more than a dozen instances."

In case it's helpful for further context, the break-down of the entities we've removed associated with people

EXHIBIT E

Why does CT tell a different story than our internal number?

- Crowdtangle shows engagement not views, and a simple text search for "vaccine" in Crowdtangle doesn't have the same recall as our classifiers, i.e., doesn't include all of the posts about vaccines. The data that we provided doesn't include the Tucker Carlson video because our data pipelines don't populate that quickly – we provided data for the week before.

Why label this content with a generic "visit the covid information center" message?

- Our more granular label about vaccine safety says "COVID-19 vaccines go through many test for safety and effectively before they're approved". In light of the decision to pause the J&J vaccine, vaccine safety discussion evolved past "approval," and we were concerned that this was a confusing/irrelevant message to be applying to content discussion the decision to pause J&J without revoking approval. We temporarily reverted to a more generic message and are updating the more specific label for posts about vaccine safety to say "COVID-19 vaccines go through many tests for safety and effectiveness and then are monitored closely" to try to adapt to the changing factual situation and evolving discussion.

From: Nick Clegg <[REDACTED]@fb.com>

Date: Saturday, April 17, 2021 at 3:30 PM

To: Brian Rice <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>

Cc: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>

Subject: Re: Email to Andy with report

No time yet - I asked him to ping me when he wants to spk. If you want to jot down a few thoughts we Rob's Qs that's great but don't disturb your weekend unduly, I'm sure I can manage without too.

Get [Outlook for iOS](#)

From: Brian Rice <[REDACTED]@fb.com>

Sent: Saturday, April 17, 2021 12:05:37 PM

To: Nick Clegg <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>

Cc: [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>; [REDACTED] <[REDACTED]@fb.com>

Subject: Re: Email to Andy with report

Nick—let us know if your call with Andy lands for a specific time this weekend? We aren't responding to Rob's questions over email but we can still get you some info in case Andy brings these up.

From: Nick Clegg <[REDACTED]@fb.com>

Date: Friday, April 16, 2021 at 9:07 PM

To: Brian Rice <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>

Cc: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>

Subject: Re: Email to Andy with report

Done – thx so much. N

From: Brian Rice <[REDACTED]@fb.com>

Date: Friday, April 16, 2021 at 5:53 PM

To: [REDACTED] <[REDACTED]@fb.com>, Nick Clegg <[REDACTED]@fb.com>

Cc: [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>, [REDACTED] <[REDACTED]@fb.com>

Subject: Re: Email to Andy with report

Nick—attached is the report to send with the email.

CONFIDENTIAL TREATMENT REQUESTED
NOT FOR DISTRIBUTION
MEMBERS & STAFF ONLY

META-118HJC-0053334

EXHIBIT F

Case: 23-30445 Document: 161 Page: 106 Date Filed: 08/07/2023

From: Sheryl Sandberg [REDACTED]
To: Nick Clegg
Sent: 7/21/2021 4:49:24 PM
Subject: Re: Covid misinfo: Delta assessment + Mitigations

Sounds good

From: Nick Clegg <[REDACTED]@fb.com>
Sent: Wednesday, July 21, 2021 2:13:45 PM
To: Sheryl Sandberg <[REDACTED]@fb.com>
Subject: Re: Covid misinfo: Delta assessment + Mitigations

Well, I'm pushing [REDACTED] et al to see what more data we can share with them which is a big ask from the WH – the problem is they disregard the “reach” data (vs engagement) that we already share with them, and they don't ask the same of other cos (YT et al) so I'm going to propose to Surgeon Gen on Fri that he asks for comparative data from all the cos not just us which should move things along on that front.

Re misinfo itself it's worth reading the email from [REDACTED] in detail – what the WH appears to want us to remove ranges from humor to totally non violating chatter about vaccines. I can't see Mark in a million years being comfortable with removing that – and I wouldn't recommend it.

We don't need to decide everything at once – we should wait to see what Surgeon Gen tells me on Fri before deciding how/whether we need to make any bigger moves.

[REDACTED] now tells me that she's sceptical that the “blackholing” of links actually works in practice – frustrating – so if you answer to the wider thread be aware that it's not yet clear whether it's workable.

N

From: Sheryl Sandberg <[REDACTED]@fb.com>
Date: Wednesday, July 21, 2021 at 11:01 PM
To: Nick Clegg <[REDACTED]@fb.com>
Subject: RE: Covid misinfo: Delta assessment + Mitigations

I am for this – should I reply to the broader thread?

And you sure we should not do more?

From: Nick Clegg <[REDACTED]@fb.com>
Sent: Wednesday, July 21, 2021 1:58 PM
To: Sheryl Sandberg <[REDACTED]@fb.com>
Subject: Re: Covid misinfo: Delta assessment + Mitigations

Possibly the highlighted bit – the team still needs to bottom out details – keen to know whether you and Mark would be supportive. N

From: Sheryl Sandberg <[REDACTED]@fb.com>
Date: Wednesday, July 21, 2021 at 10:47 PM
To: Nick Clegg <[REDACTED]@fb.com>
Subject: RE: Covid misinfo: Delta assessment + Mitigations

EXHIBIT G

